

Comments on Preliminary Site Suitability Evaluation

SEP 21 2001

1) I do not believe the Waste Handling Building Ventilation system or the Emergency Power Source and Distribution systems are correctly classified at QL-2. I believe the systems should be QL-1. Here is the basis for the ventilation system:

On page 2-10 at the top of the page left side the document states " QL-1 structures, systems, and components include those items required to:

- Maintain containment...
- **Prevent or mitigate a Category 1 or 2 design basis event that could result in exceeding specified offsite dose limits.**

Page 2-13 lists the SSCs and their Function Important to Safety.

The Waste Handling Building Ventilation system's function is to "Mitigate the consequences of a facility design basis event." The system is mentioned frequently in the discussion portion of the internal design basis event sequences as a major component of particulate release confinement.

If the system is required for the mitigation of the radiological consequences of these events, the quality classification should be QL-1.

The basis for electric power is similar:

A safety system, by definition, must encompass all of the elements required to achieve a protective or safety function. The Waste Handling Building Emergency Power system's function is to "Support the Waste Handling Building Primary Ventilation system in mitigating the consequences of a facility design basis event."

If the system is required to transmit sufficient energy for use in the mitigation of the radiological consequences of analyzed events, the quality classification should be QL-1.

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